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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PATRIC LAMB, individually;

Plaintiff,

vs.

CASE NO.: 2:20-cv-00514-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(Second Request)

TARGET CORPORATION, A Foreign
Corporation; DOES 1-20 and ROE BUSINESS
ENTITIES 1-20;

Defendants.

Plaintiff, PATRIC LAMB, by and through his attorney of record, Charles S. Jackson, Esq., of the Richard Harris Law Firm, and Defendant, TARGET CORPORATION, by and through its attorneys of record, Loren S. Young, Esq. and Caroline Roske Reilly, Esq. of LINCOLN, GUSTAFSON & CERCOS, LLP hereby agree and stipulate to extend discovery as follows.

1. Summary of Discovery Completed

- The parties exchanged initial NRCP 16.1 disclosures of witnesses and exhibits;
- The parties have each propounded, and responded to, written discovery;
- Plaintiff provided HIPAA-compliant authorizations and Defendant has obtained Plaintiff's medical records;
- The Parties have deposed Plaintiff Patric Lamb; and
- The Parties have disclosed initial experts.



2. Discovery to be Completed

- The Parties need time to obtain records from the social security administration and conduct additional depositions of the FRCP 30(b)(6) Designee for Defendant Target Corporation, percipient witness Jim McKenzie, as well as the Experts disclosed in this matter.

3. Reasons why Discovery Was Not Completed

As evidenced by the foregoing, the necessary discovery has commenced. The lockdowns and closings related to the COVID-19 pandemic have created a situation where obtaining records is difficult, if not near impossible, especially governmental records. Consequently, additional time is necessary in order to complete the remaining discovery. Furthermore, given the current restriction on travel and/or personal contact necessitated by the COVID-19 pandemic, it is anticipated that most of the remaining discovery will not reasonably be able to occur for several months. Specifically, the variation of stay at home orders from state to state has frustrated travel in conducting certain fact witness depositions, party depositions, and Rule 35 examinations. The parties have also met and conferred regarding Plaintiff's social security disability records and Plaintiff has agreed to provide Target with the SSA Consent for Release of Information Form. The parties agree that this request is not made for the purpose of delay, but to ensure a just adjudication of the case on the merits, and that neither party will be prejudiced by the requested extension.

4. Current Discovery Deadlines

The discovery dates and deadlines are currently set as follows:

- Close of Discovery: April 5, 2021
- Initial Expert Disclosure Deadline: February 2, 2021
- Rebuttal Expert Disclosure Deadline: March 4, 2021
- Dispositive Motion Deadline: May 4, 2021
- Pre-Trial Motion Deadline: June 3, 2021

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5. Proposed Discovery Deadlines

- Close of Discovery: June 7, 2021
- Dispositive Motion Deadline: July 7, 2021
- Pre-Trial Motion Deadline: August 9, 2021
- Expert Deadlines: Unchanged

DATED this 4th day of March, 2021.**RICHARD HARRIS LAW FIRM**/s/ Charles S. Jackson**CHARLES S. JACKSON, ESQ.**

Nevada Bar No. 13158
801 South Fourth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiff

DATED this 1st day of March, 2021.**LINCOLN, GUSTAFSON & CERCOS, LLP**/s/ Caroline Roske Reilly, Esq.**LOREN S. YOUNG, ESQ.**

Nevada Bar No. 7567
CAROLINE ROSKE REILLY, ESQ.
Nevada Bar No. 13236
3960 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169
Attorneys for Defendant

IT IS SO ORDERED:

Dated the 5th day of March 2021



UNITED STATES MAGISTRATE JUDGE



From: Caroline Reilly <CREilly@lgclawoffice.com>

Sent: Monday, March 1, 2021 3:29 PM

To: Charlie Jackson <Charlie@richardharrislaw.com>

Cc: Amy Chandler <achandler@richardharrislaw.com>; Loren Young <lyoung@lgclawoffice.com>; Carmen Cherry <CCherry@lgclawoffice.com>

Subject: RE: SAO to extend Lamb

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Looks good. Please e-sign for me.

From: Charlie Jackson <Charlie@richardharrislaw.com>

Sent: Monday, March 1, 2021 3:06 PM

To: Caroline Reilly <CREilly@lgclawoffice.com>

Cc: Amy Chandler <achandler@richardharrislaw.com>; Loren Young <lyoung@lgclawoffice.com>; Carmen Cherry <CCherry@lgclawoffice.com>

Subject: RE: SAO to extend Lamb

Here you go- is this fine?

Sent from [Mail](#) for Windows 10

From: [Caroline Reilly](#)

Sent: Thursday, February 25, 2021 11:16 AM

To: [Charlie Jackson](#)

Cc: [Amy Chandler](#); [Loren Young](#); [Carmen Cherry](#)

Subject: RE: SAO to extend Lamb

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Charlie: Would you mind sending over a revised draft?

From: Charlie Jackson <Charlie@richardharrislaw.com>

Sent: Thursday, February 25, 2021 9:35 AM

To: Caroline Reilly <CREilly@lgclawoffice.com>

Cc: Amy Chandler <achandler@richardharrislaw.com>; Loren Young <lyoung@lgclawoffice.com>; Carmen Cherry <CCherry@lgclawoffice.com>

Subject: RE: SAO to extend Lamb

I'm fine with changes. Can I e-sign for you?

Sent from [Mail](#) for Windows 10

From: [Caroline Reilly](#)

Sent: Wednesday, February 24, 2021 3:58 PM

To: [Charlie Jackson](#)

Cc: [Amy Chandler](#); [Loren Young](#); [Carmen Cherry](#)

Subject: RE: SAO to extend Lamb

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Hi Charlie:

Thanks for drafting this stipulation. My edits are attached. Please let me know if you have any questions.

Sincerely,
Caroline

From: Charlie Jackson <Charlie@richardharrislaw.com>
Sent: Tuesday, February 23, 2021 1:33 PM
To: Caroline Reilly <CREilly@lgclawoffice.com>
Cc: Amy Chandler <achandler@richardharrislaw.com>
Subject: SAO to extend Lamb

Hey Ms. Reilly,

Please find the attached proposed SAO To Extend Discovery we discussed last time we spoke. Please let me know if I can submit to the Court.

Thank you,

Charles Jackson
Lawyer-Partner